

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DANIEL ALLEN BYRAM,
Administrator of the Estate
and Natural Father of
JOHNATHON BYRAM, deceased,

Plaintiff

vs.

No. 3:10-CV-593

MARK T. RENEHAN,
THOMAS (a/k/a TODD) S. RENEHAN,
BETH L. RENEHAN, JAMES
RENEHAN, PATRICIA RENEHAN
and
JOSEPH CONNORS, JR.

Defendants

**PLAINTIFF'S RESPONSE TO AFFIRMATIVE DEFENSES OF
DEFENDANTS, MARK RENEHAN, THOMAS S. RENEHAN AND BETH L. RENEHAN**

1-4. These are legal conclusions necessitating no answer pursuant to the Federal Rules of Civil Procedure. Alternatively, however, if the Court determines a responsive pleading is necessary, Plaintiff specifically denies each of the Defendants' allegations and maintains that Plaintiff's decedent was an innocent victim of the Defendants' negligent, careless and reckless conduct as stated in Plaintiff's Complaint which is incorporated herein by reference as if fully set forth at length.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in his favor and against the Defendants.

Respectfully submitted,

Foley, McLane, Foley, McDonald & MacGregor, P.C.

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